

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
EMIGRA GROUP, LLC, :
:
Plaintiff, :
:
--against-- : No. 07-cv-10688 (LAK) (HP)
:
ECF CASE
FRAGOMEN, DEL REY, BERNSEN & LOEWY, :
LLP; FRAGOMEN, DEL REY, BERNSEN & :
LOEWY II, LLP; FRAGOMEN GLOBAL :
IMMIGRATION SERVICES, LLC; FRAGOMEN :
GLOBAL LLP; AND RYAN MATTHEW FREEL, :
:
Defendants. :
:
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NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Defendants Fragomen, Del Rey, Bernsen & Loewy, LLP, Fragomen, Del Rey, Bernsen & Loewy II, LLP, Fragomen Global Immigration Services, LLC, Fragomen Global LLP, and Ryan Freel, upon the accompanying Declarations of Daryl Buffenstein, Lance Kaplan, and George Kosicki; the exhibits thereto; the accompanying Memoranda of Law and Statement Pursuant to Local Civil Rule 56.1, both dated February 22, 2008; and all prior pleadings and proceedings herein, will move this Court, before The Honorable Lewis A. Kaplan, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, as soon as counsel may be heard, for an Order (1) granting summary judgment in favor of defendants dismissing the Amended Complaint dated December 21, 2007 filed by Plaintiff Emigra Group, LLC, pursuant to Rule 56

of the Federal Rules of Civil Procedure and 28 U.S.C. § 1367(c)(3); and (2) granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1 of the Rules of this Court, opposition papers, if any, must be served on defendants' counsel within 10 business days.

Dated: New York, New York
February 22, 2008

COVINGTON & BURLING LLP

GISKAN SOLOTAROFF & ANDERSON LLP

By: /s/ C. William Phillips

Charles E. Buffon
C. William Phillips
Andrew A. Ruffino
Anna E. Lumelsky

620 Eighth Avenue
New York, New York 10018
Tel: (212) 841-1000

By: /s/ Darnley D. Stewart

Darnley D. Stewart
11 Broadway, Suite 2150
New York, New York 10004
Tel: (212) 500-5106

Counsel to Defendant Ryan Freel

*Counsel to Defendants Fragomen, Del Rey,
Bernsen & Loewy, LLP, Fragomen, Del
Rey, Bernsen & Loewy II, LLP, Fragomen
Global Immigration Services, LLC, and
Fragomen Global LLP*

To:

Michael D. Pinnisi, Esq.
PINNISI & ANDERSON, LLP
111 North Tioga Street, Suite 200
Ithaca, New York 14850
Tel: (607) 257-8000
Fax: (607) 257-0990

Counsel to Plaintiff Emigra Group LLC